

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
NO 4:14-CV-34 FL

FILED

APR 29 2014

JULIE A. RICHARDS, CLERK  
US DISTRICT COURT, EDNC  
BY JAR DEP CLK

Thomas Everett, Jr. : Plaintiff's First  
v. : Request for Production  
Jesse Vann White, et al : Of Documents

Pursuant to Rule 34 of the Federal Rule of Civil Procedure, the Plaintiff request that Defendants, Produce for inspection and Copying the following documents identified below.

If Defendants makes any deletions or redactions to documents produced, or Withholds any documents from production Under a Claim of privilege or otherwise, the Plaintiff request that Defendants an appropriate privilege log. The Plaintiff request that the privilege log itemize each deletion or redaction and the parties communicating in the entry deleted, and identify specifically the privilege claimed. The Plaintiff request also that Defendants provide for each entry in the privilege log a sufficient description of the communication to identify the topic without disclosing specifics deemed protected.

1. Jesse Vann White Produce and Provide a Copy of the Complete and proper towing procedures Set fourt by the Commissioner of the North Carolina Division of motor Vehicles and the Clerk of Edgecombe County Superior Court For Authorization and sell of all towed motor Vehicles in the State of North Carolina.
2. Jesse Vann White Produce and Provide A Copies of any Contract Providing Wrecker Services to Law Enforcement, including Tarboro Police Department, Princeville Police Department, Edgecombe County Sheriff Department and State Highway Patrol.
3. Jesse Vann White produce and Provide a Copy of his records and also White Wrecking Service, Inc. of all Vechicles that was sold Without title and the proper paper Work to do the above for each vehicle.
4. Jesse Vann White Produce and Provide a Copy all register Vehicle that owned by him and by White Wrecking Service, INC. include Year, Make and VIN number from Division of Motor Vehicles.

5. William A Barnes Produce and Provide a Copy of your Oath of Office, Bond Name and address of your bond Company. And provide a list of any and all law Suits that been filed against you in the last 10 years.
6. William A Barnes Produce and Provide Work history and disciplinary action while working For Princeville Police Department, Town of Princeville and any Other law Enforcement Department.
7. William A Barnes Provide a Copy of all register Vehicles that own by you including Year, Make, and VIN number from any Division of Motor Vehicles.
8. William A Barnes Provide Copies of a detail Phone record of 252-227-2524 from Your Phone Company from October 2012 until March 2014.
9. Princeville Police Department Produce and Provide a Copy of William A Barnes Work history and disciplinary action While employed by the Department.
10. Princeville Police Department Produce and Provide Copy of any lawsuit or litigation log(whether maintained in hard or otherwise) Wherby Princeville Police Department identifies and lists all litigation in Which Princeville Police Department was named Party Filed in any state or federal Court in the past ten(10) years.
11. Town of Princeville Produce and Provide a Copy of William A Barnes Work history and disciplinary action While employed by the Town of Princeville.
12. Town of Princeville Produce and Provide Copy of any lawsuit or litigation log Whether maintained in hard Copy or otherwise Wherby Town of Princeville identifies and lists all litigation in which Town of Princeville was named Party Filed in any state of federal Court in the Past ten(10) years.
13. Diana Lee Draughn Produce and Provide Copy of your Notary Certificate and the rules and duties of a North Carolina Notary.
14. Diana Lee Draughn Produce and Provide Copy of a detail Phone record of 252-883-1419 from Your Phone Company from OCTOBER 2012 until March 2014.

15. Donyell Weaver Produce and Provide Copy of Your oath of office, Bond and Name and address of your bond Company. Provide a Copy of any lawsuit or litigation log whether maintained in hard copy or otherwise whereby You identifies and lists all litigation in which You is or was named party Filed in any State or federal Court in the past ten(10) Years. ~~including~~
16. Donyell Weaver Produce and Provide Work history and any disciplinary action while employed for Edgecombe County Sheriff Department and Pitt County Sheriff Department or any other law Enforcement Department.
17. Donyell Weaver Provide Copy of all register Vehicle that own- by You including Year Make and VIN number from any Division of Motor Vehicles.
18. Donyell Weaver Provide a Copy of detail Phone records of 252-567-4543 from Your Phone Company from October 2012 until March 2014
19. All Defendants Produce and Provide financial disclosure.

Date: 4-22-14

by: Thomas Everett, Jr.

Thomas Everett, Jr.  
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